



Todd A. Spodek, Esq.
Direct Dial: (347) 292-8633
ts@spodeklawgroup.com

January 8, 2025

BY ECF:

The Honorable Barabra Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

RE: United States v. Jose Aburto
Case No.: 1:24-mj-01076-1
Southern District of New York
Second Letter Motion Seeking Temporary Modification of Conditions of Release

Dear Magistrate Judge Moses:

Please be advised that I represent **Jose Aburto** in the above-captioned action.

Mr. Aburto is currently subject to release conditions as per the March 14, 2024 Appearance Bond (See ECF No. 3). Pursuant to his Bond, Mr. Aburto's travel is currently restricted to the Southern and Eastern Districts of New York, and he has surrendered his travel documents.

We respectfully request two temporary modifications of Mr. Aburto's release conditions. Mr. Aburto seeks permission from the court for the temporary return of his passport and travel to Paris, France, for a work event. This is his second request for a temporary modification.

Mr. Aburto works for Christian Dior as a Grand Vendeur. He was selected to host the company's VIP clients at its Haute Couture Spring-Summer 2025 fashion show in Paris. This work assignment requires him to travel from January 24, 2025 through January 31, 2025.

All other restrictions on Mr. Aburto will remain in place throughout his trip, and the temporary modification will terminate on February 1, 2025.

I have also spoken with PTSO Taelor Nisbeth regarding this request. Her office has agreed to release Mr. Aburto's passport subject to Your Honor's approval of this request. PTSO Nisbeth does not object to Mr. Aburto's planned travel. I have also

The Honorable Barbara Moses

Page 2 of 2

spoken with AUSA Adam S. Sowlati regarding this request. His office will defer to Pretrial Services on this matter.

Thank you in advance for your time and consideration in this matter.

Sincerely,
Spodek Law Group P.C.
/s/ Todd A. Spodek
Todd A. Spodek

cc: All Counsel of Record (By ECF).
PTSO Taelor Nisbeth (By Email).

Application GRANTED. **SO ORDERED.**

A handwritten signature in blue ink, appearing to read 'Barbara Moses', is written over a horizontal line.

Barbara Moses
United States Magistrate Judge
January 13, 2025